

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

BENZOR SHEM VIDAL,

Plaintiff,

v.

ADVANCED CARE STAFFING, LLC,

Defendant.

No. 22 Civ. 05335 (NM)(MMH)

**DECLARATION OF DAVID H. SELIGMAN IN SUPPORT OF PLAINTIFF'S
MOTION FOR PRELIMINARY INJUNCTION**

I, David Seligman, pursuant to 28 U.S.C. § 1746, declare under penalty of perjury as follows:

1. I am the Executive Director of Towards Justice, which, together with Kakalec Law PLLC and Nichols Kaster, PLLP, represents Plaintiff Benzor Shem Vidal in this action. I am an attorney in good standing admitted to practice before this Court.

2. I have been one of the lawyers primarily responsible for the prosecution of Plaintiff's claims in this case.

3. I make the statements in this Declaration based on my personal knowledge, and would so testify if called as a witness at trial.

Exhibits

4. Attached hereto as Exhibit 1 is a true and correct copy of the Declaration of Benzor Shem Vidal.

5. Attached hereto as Exhibit 2 is a true and correct copy of the 2019 Contract between Mr. Vidal and Defendant Advanced Care Staffing (“ACS”).

6. Attached hereto as Exhibit 3 is a true and correct copy of a letter dated January 4, 2022.

7. Attached hereto as Exhibit 4 is a true and correct copy of the 2022 Contract between Mr. Vidal and ACS.

8. Attached hereto as Exhibit 5 is a true and correct copy of a letter dated June 22, 2022.

9. Attached hereto as Exhibit 6 is a true and correct copy of ACS’s demand for arbitration.

10. Attached hereto as Exhibit 7 is a true and correct copy of an email dated August 1, 2022.

11. Attached hereto as Exhibit 8 is a true and correct copy of an email dated August 10, 2022.

12. Attached hereto as Exhibit 9 is a true and correct copy of an email dated September 8, 2022.

13. Attached hereto as Exhibit 10 is a true and correct copy of an email dated September 2, 2022.

14. Attached hereto as Exhibit 11 is a true and correct copy of an email dated September 7, 2022.

15. Attached hereto as Exhibit 12 is a true and correct copy of an email dated September 19, 2022.

16. Attached hereto as Exhibit 13 is a true and correct copy of an email dated

October 6, 2022.

17. Attached hereto as Exhibit 14 is a true and correct copy of a letter dated October 20, 2022.

18. Attached hereto as Exhibit 15 is a true and correct copy of a letter dated October 28, 2022.

19. Attached hereto as Exhibit 16 is a true and correct copy of a letter dated November 10, 2022.

20. Attached hereto as Exhibit 17 is a true and correct copy of a letter dated Dec. 2, 2022.

21. Attached hereto as Exhibit 18 is a true and correct copy of an email dated Oct. 24, 2022.

22. Attached hereto as Exhibit 19 is a true and correct copy of an order dated December 9, 2022.

23. Attached hereto as Exhibit 20 is a true and correct copy of a letter dated January 4, 2023.

24. Attached hereto as Exhibit 21 is a true and correct copy of an email dated January 4, 2023.

25. Attached hereto as Exhibit 22 is a true and correct copy of a letter dated January 9, 2023.

26. Attached hereto as Exhibit 23 is a true and correct copy of a letter dated January 9, 2023.

27. Attached hereto as Exhibit 24 is a true and correct copy of the AAA Commercial Rules.

28. Attached hereto as Exhibit 25 is a true and correct copy of a letter dated January 4, 2023.

Dated: January 20, 2023

Respectfully submitted,

/s/

David H. Seligman (*pro hac vice*)

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